# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

JUL 0 1 2020

SAN JUAN, PR

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

FILED UNDER SEAL

CRIMINAL NO. 20-<u>206</u> (FAB)

Violations:

٧.

COUNT ONE

Title 21, United States Code, §§ 841(a)(1) and

846.

ALDO PIMENTEL RAMIREZ, Defendant.

**COUNT TWO** 

Title 21, United States Code, §§ 952,960 and

963.

Forfeiture Allegation

Title 21, United States Code, § 853 and Rule

32.2(a) F.R.C.P.

(TWO COUNTS)

THE GRAND JURY CHARGES:

## **COUNT ONE**

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

From at least in or about May 2017, up to and including in or about November 2019, in Puerto Rico, and elsewhere, and within the jurisdiction of this Court,

# ALDO PIMENTEL RAMIREZ,

the defendant herein, did knowingly and intentionally, combine, conspire, and agree with others, known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, United States Code Sections 841(a)(1) and 846.

## COUNT TWO

(Conspiracy to Distribute a Controlled Substance for Purpose of Unlawful Importation)

From at least in or about May 2017, up to and including in or about November 2019, in the country of the Dominican Republic, and elsewhere,

## ALDO PIMENTEL RAMIREZ,

the defendant herein, did knowingly and intentionally, combine, conspire, and agree with other persons known and unknown to the Grand Jury, to import into the customs territory of the United States, from a place outside thereof, five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II, Narcotic Drug Controlled Substance. All in violation of Title 21, <u>United States Code</u>, Sections 952, 960 and 963.

(SPACE INTENTIONALLY LEFT IN BLANK)(CONTINUED ON THE NEXT PAGE)

## NARCOTICS FORFEITURE ALLEGATION

The allegation contained in Count One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, <u>United States Code</u>, Sections 853 and 970.

Pursuant to Title 21, United States Code, Sections 853 and 970, upon conviction of the controlled substance offense alleged in Count ONE and TWO, the defendant, Aldo Pimentel Ramirez, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

# TRUE BILL

**FOREPERSON** 

Date: 1July 2020

W. STEPHEN MULDROW United States Attorney

Alberto R. López-Rocafort

Assistant United States Attorney

Chief, Gang Section

Teresa Zapata Valladares

Assistant United States Attorney

Deputy Chief, Gang Section